

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ABDULRAHMAN ALHARBI

Plaintiff,

v.

GLENN BECK; THE BLAZE, INC.
MERCURY RADIO ARTS, INC.; AND
PREMIERE RADIO NETWORKS, INC.

Defendants.

Civil Action No.

COMPLAINT
AND DEMAND FOR TRIAL BY JURY

For his complaint in this action, the Plaintiff, Abdulrahman Alharbi, states the following:

Introduction

1. This is an action for defamation and slander arising out of the bombing at the 2013 Boston Marathon. The Plaintiff, Abdulrahman Alharbi, is a 20 year old student who was a spectator at the Marathon and was injured in the bombing. Mr. Alharbi, like many others, was questioned by federal authorities investigating the events of that day. Those authorities also, with his permission, searched his apartment. The responsible officials quickly concluded that Mr. Alharbi, other than being injured in the attacks, had no involvement in the attacks. Many news outlets reported the facts of the search of an apartment and that authorities had questioned a man of Middle Eastern descent. When the authorities concluded that Mr. Alharbi had no involvement, reports ceased. The Defendant Glenn Beck, with the active participation of the distributor defendants, repeatedly and falsely identified Mr. Alharbi as an active participant in the crimes that were committed on April 15, 2013, repeatedly questioned the motives of federal

officials in failing to pursue or detain Mr. Alharbi and repeatedly and falsely accused Mr. Alharbi of being a criminal who had funded the attacks that took place at the Boston Marathon. Those statements were made widely and publicly. The statements were false and did grave injury to the Plaintiff.

Parties

2. The Plaintiff, Abdulrahman Alharbi ("Alharbi"), is a natural person and a citizen of Saudi Arabia who resides at Revere, Massachusetts.

3. The Defendant Glenn Beck is a natural person who is a resident of Westlake, Texas.

4. The Defendant The Blaze, Inc. ("Blaze") is a Delaware corporation with a usual place of business at Dallas, Texas.

5. The Defendant Mercury Radio Arts, Inc. ("Mercury") is a Delaware corporation with a usual place of business at Dallas, Texas.

6. The Defendant Premiere Radio Networks, Inc. ("Premiere") is a Delaware corporation with a usual place of business at Sherman Oaks, California. The Defendants Blaze, Mercury and Premiere are referred to below as the "Distributor Defendants."

Jurisdiction and Venue

7. This Court has subject matter jurisdiction over this action pursuant to 28 USC § 1332 because Alharbi is a citizen of a foreign state, each of the Defendants are citizens of the United States and the amount in controversy exceeds the sum of \$75,000, exclusive of interest and costs.

8. Pursuant to 28 U.S.C. § 1391(a), venue is appropriate in this Court because a substantial part of the events or omissions giving rise to the claims herein occurred in this Judicial District.

Facts

9. Alharbi was a spectator at the Boston Marathon on April 15, 2013.

10. Alharbi incurred physical injuries for wounds received as a result of the explosion of incendiary devices in the City of Boston during the Boston Marathon event on April 15, 2013.

11. The Defendant Glenn Beck is a radio and television commentator who broadcasts a radio and television show on a daily basis to the public.

12. Mr. Beck has a substantial audience. The show is broadcast throughout the United States and published on the internet for viewers and listeners throughout the world.

13. The show is owned by the Defendant Blaze, and its parent corporation the Defendant Mercury.

14. The Defendant Premiere syndicates and distributes the show to radio stations throughout the United States.

15. On and after April 15, 2013, Beck broadcast repeated statements distributed and published to others by the Distributor Defendants identifying Alharbi as an active participant in the crimes that were committed in Boston on April 15, 2013.

16. Beck repeatedly questioned the motives of federal officials in failing to pursue or detain Alharbi and repeatedly suggested that Alharbi had engaged in wrongful and criminal

activity that resulted in mass injury to others, but was being protected by the wrongful acts of others covering up those crimes on his behalf.

17. Beck falsely accused Alharbi of being a criminal who had funded the attacks that took place at the Boston Marathon.

18. On or about May 8, 2013, and at repeated and diverse times thereafter, Beck stated that Alharbi was the "money man" who had funded the attacks at the Boston Marathon.

19. The statements made by Beck were false.

20. The statements made by Beck were published widely to others throughout the United States and the world.

21. As a direct and proximate result of the statements made by Beck and published and broadcast by the Distributor Defendants, Alharbi's reputation has been substantially and severely damaged.

22. Alharbi has received numerous messages, internet postings and other communications based on Beck's false statements accusing him of being a murderer, child killer and terrorist.

Count One
Defamation
(v. All Defendants)

23. The Plaintiff incorporates by reference and realleges paragraphs 1 through 22 above.

24. Beck has made, broadcast and published the statements set forth above about Alharbi.

25. The statements made by Beck were false

26. Blaze, Mercury and Premiere published and broadcast the statements to others.

27. Alharbi has been injured as a direct and proximate result of the false statements made by Beck and broadcast and distributed by each of the Defendants.

Count Two
Defamation with Malice
(v. Beck)

28. The Plaintiff incorporates by reference and realleges paragraphs 1 through 27 above.

29. The statements made Beck were made with actual malice.

Prayers For Relief

Wherefore, the Plaintiff prays that the Court enter judgment as follows:

1. On Count I, that the Court determine the amount of damages suffered by the Plaintiff and enter judgment in that amount plus interest, costs and attorneys fees against each of the Defendants; and
2. On Count II, that the Court determine the amount of damages suffered by the Plaintiff and enter judgment in that amount plus interest, costs, attorneys fees and punitive damages against the Defendant Glenn Beck individually; and

3. That the Court grant such other and further relief as is just.

THE PLAINTIFF DEMANDS A TRIAL BY JURY ON ALL COUNTS

Abdulrahman Alharbi

By his attorneys,

/s/Peter J. Haley
Peter J. Haley (BBO #543858)
peter.haley@nelsonmullins.com
Nelson Mullins Riley & Scarborough LLP
One Post Office Square
Boston, MA 02109
p. (617) 573-4700
f. (617) 573-4710

Dated: March 28, 2014